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Attorneys For Defendant Portfolio Recovery Associates, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JESSICA SCHEDENECK,)	CASE NO. 2:22-cv-01348-GMN-NJK
)	
Plaintiff,)	STIPULATION TO EXTEND
)	TIME TO FILE RESPONSE TO
vs.)	COMPLAINT
)	
PORTFOLIO RECOVERY ASSOCIATES, LLC)	(First Request)
)	
Defendant.)	
)	

Pursuant to Local Rule IA 6-1, Defendant Portfolio Recovery Associates, LLC (“PRA”) by and through its attorney, Philip Lo of Gordon Rees Scully Mansukhani, LLP and Plaintiff Jessica Schedeneck, by and through her attorney Michael Kind of Kind Law, hereby stipulate and agree as follows:

1. Plaintiff filed her Complaint on August 18, 2022.
2. PRA was served with the summons and Complaint on August 22, 2022.
3. As such, PRA’s responsive pleading deadline was due on September 12, 2022.¹
4. PRA has just retained the undersigned counsel to represent its interests in this matter.

¹ Prior to engaging counsel, PRA communicated directly with Plaintiff’s counsel regarding an extension of this deadline. PRA’s newly retained counsel now approaches this Court regarding the extension at its earliest opportunity to do so.

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1 5. In order to review and investigate the file, determine whether resolution is
2 possible, and communicate with opposing counsel regarding the claims at issue, PRA requests
3 a 30-day extension to file its response to the Complaint, to October 19, 2022.

4 6. PRA's counsel has communicated with Plaintiff's counsel, and Plaintiff consents
5 to the requested extension.

6 7. This is PRA's first extension request. Good cause exists, as the parties seek this
7 extension to allow for exploration of early resolution without incurring unnecessary fees and
8 costs.

9 8. This stipulation is made in good faith and is not intended to inflict unnecessary
10 delay.

11 9. Pursuant to this Court's local rules, a proposed Order has been attached hereto as
12 Exhibit A.

13 IT IS SO STIPULATED.

14 DATED September 19, 2022.

15 GORDON REES SCULLY MANSUKHANI,
16 LLP

17
18 By: /s/ Philip Lo
Philip Lo
Attorneys for Defendant
Portfolio Recovery Associates, LLC

19
20 KIND LAW

21
22 By: /s/ Michael Kind (with permission)
Michael Kind
Attorneys for Plaintiff

23
24 IT IS SO ORDERED.

Dated: September 20, 2022

25
26
27 
Nancy J. Koppe
United States Magistrate Judge

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